National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

April 29, 2013

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an information session hosted by the B612 Foundation on May 7, 2013

On May 7, 2013, B612 Foundation, a not-for-profit organization under Section 501(c)(3) of the Internal Revenue Service Code, will hold a reception and presentation. This event will take place at the Carnegie Institution of Washington, at 1530 P Street, N.W., Washington, D.C. from 6 pm to 8 pm. The purpose of the event is to provide information about the foundation's Sentinel project to build and operate a privately funded interplanetary mission to place an infrared space telescope in solar orbit to track asteroids whose orbits could approach and potentially threaten the Earth.

Approximately 400 people are expected to attend. Attendees will include NASA personnel and other federal agencies, congressional staff, and representatives from academia and industry. The estimated cost of the event, including all food and beverages, is around $44 per person. Seating for the presentation will not be assigned.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information on NASA's programs and policies, and to learn about B612's interplanetary space initiatives. Accordingly, NASA employees whose duties do not substantially affect the B612 Foundation, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone